

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

CAROLYN CLARK, et al.,

*Individually and on behalf of a class of
similarly situated persons,*

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendant.

Civil Action No.: 3:16-CV-32-MHL

AGREED ORDER

CAME NOW Defendant, Experian Information Solutions, Inc. (“Experian”), and Plaintiff Carolyn Clark and those individuals similarly situated (collectively, “Plaintiffs”), by counsel, together Plaintiffs and Experian are referred to as “the Parties”, upon their Joint Request for Entry of an Agreed Scheduling Order.

Experian contends that the issue of willfulness is a uniquely critical one in this case and if possible should be resolved as soon as practicable. Experian has stated its intent to file an early Motion for Summary Judgment as to willfulness and Plaintiffs have stated their concurrence in such early filing. Each Party believes that the Court’s summary judgment decision will be important in valuation of the case for settlement if the motion is denied.

UPON CONSIDERATION WHEREOF, for good case shown, and by agreement of the Parties, it is hereby,

ORDERED, ADJUDGED and DECREED that

1. The Parties will exchange initial disclosures under Rule 26(a)(1) on or before July 12, 2016. Experian will identify any documents and persons whose statements it knows at that

Richmond, Virginia
Date: June 29, 2016